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18 *Attorneys for Individual and Representative Plaintiffs*  
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19 [Additional Counsel Listed on Signature Page]

20  
21                   **UNITED STATES DISTRICT COURT**  
22                   **NORTHERN DISTRICT OF CALIFORNIA**  
23                   **SAN JOSE DIVISION**

24  
25                   **Cung Le, Nathan Quarry, Jon Fitch, on behalf of**  
26                   **themselves and all others similarly situated,**

Case No. 5:14-cv-05484-EJD

27                   **Plaintiffs,**

v.

28                   **Zuffa, LLC, d/b/a Ultimate Fighting**  
29                   **Championship and UFC,**

**ADMINISTRATIVE MOTION TO**  
**CONSIDER WHETHER CASES**  
**SHOULD BE RELATED PURSUANT**  
**TO CIVIL L. R. 3-12 AND 7-11**

**Defendant.**

1 Luis Javier Vazquez and Dennis Lloyd Hallman,  
 2 on behalf of themselves and all others similarly  
 situated,

Case No. 5:14-cv-05591-PSG

3 Plaintiffs,

4 v.

5 Zuffa, LLC, d/b/a Ultimate Fighting  
 6 Championship and UFC,

7 Defendant.

8

9 **TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

10 PLEASE TAKE NOTICE that, pursuant to Civil Local Rules 3-12 and 7-11, Plaintiffs Cung Le,  
 11 Nathan Quarry, and Jon Fitch (collectively, "Plaintiffs") submit this administrative motion requesting the  
 12 Court to consider whether *Vazquez et al v. Zuffa, LLC*, Case No. 5:14-cv-05591-PSG (the "*Vazquez*  
 13 Action"), filed in this District on December 22, 2014, should be related to the instant action, *Le et al. v.*  
 14 *Zuffa LLC*, Case No. 5:14-cv-05484-EJD (the "*Le action*"), filed December 16, 2014.

15 Civil Local Rule 3-12(a) provides that actions are related when (1) the actions concern substantially  
 16 the same parties, property, transaction or event; and (2) it appears likely that there will be an unduly  
 17 burdensome duplication of labor and expense or conflicting results if the cases are conducted before  
 18 different judges.

19 The *Vazquez* Action should be related to the instant action because these actions together readily  
 20 meet the criteria for relation set forth above. Indeed, no substantive difference exists between the  
 21 allegations and claims for relief in the *Vazquez* Action and in the instant action. The *Vazquez* Action  
 22 alleges facts and asserts claims involving the same scheme of anticompetitive behavior as that alleged in  
 23 the *Le* Action. As in the instant case, the *Vazquez* plaintiffs have filed suit to seek recovery on behalf of a  
 24 two classes: (1) "Bout Plaintiffs"—Elite Professional Mixed Martial Arts ("MMA") Fighters who fought  
 25 in at least one bout promoted by defendant Zuffa<sup>1</sup>; and (2) "Identity Plaintiffs"—Elite Professional  
 26 MMA Fighters whose Identity was expropriated or exploited by Zuffa. Identically to the *Le* plaintiffs,

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28 <sup>1</sup> "Zuffa" refers to Zuffa, LLC and its registered trademarks Ultimate Fighting Championship® and  
 UFC®.

1 Plaintiffs Vazquez and Hallman seek class damages and injunctive relief for monopolization under Section  
 2 of the Sherman Act, 15 U.S.C. § 2. Like the *Le* Plaintiffs, Vazquez and Hamilton allege a class period  
 3 running from December 16, 201 to the present.

4 The class period, the material allegations, the relief sought, and the defendant are the same in the  
 5 two cases. As such, these two cases will require adjudication of the same questions of law and fact.

6 Relation of the *Vazquez* Action to the first-filed *Le* Action therefore will promote the conservation of  
 7 judicial and party resources in these cases and will ensure efficiency in their prosecution and final  
 8 disposition. On the other hand, were the *Vazquez* Action to proceed separately from the *Le* Action, the  
 9 Court and the parties would experience unduly burdensome duplication of labor and expenses and would  
 10 face the possibility of conflicting results.

11 Therefore, Plaintiffs Cung Le, Nathan Quarry, and Jon Fitch respectfully request that the Court  
 12 relate the *Vazquez* Action to the *Le* Action.

13 Dated: December 23, 2014

JOSEPH SAVERI LAW FIRM, INC.

14 By: /s/ Joseph R. Saveri  
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26 *Attorneys for Individual and Representative Plaintiffs*  
27 *Cung Le, Nathan Quarry, Jon Fitch*

## **CERTIFICATE OF SERVICE**

I am over 18 years of age and am not a party to these proceedings or any of the actions that are the subject of these proceedings. My business address is 505 Montgomery Street, Suite 625, San Francisco, CA 94111.

I am readily familiar with Joseph Saveri Law Firm's practice for collection and processing of documents for mailing with the United States Postal Service, and that practice is that the documents are deposited with the United States Postal Service with postage fully prepaid the same day as the day of collection in the ordinary course of business.

I am also readily familiar with Joseph Saveri Law Firm's practice for collection and processing of documents for service via e-mail, and that practice is that the documents are attached to an e-mail and sent to the recipient's e-mail account the same day as the date listed on the Certificate of Service.

This certificate of service concerns the following document(s):

**ADMINISTRATIVE MOTION TO CONSIDER WHETHER CASES SHOULD BE RELATED PURSUANT TO CIVIL L.R. 3-12 AND 7-11**

Pursuant to Civil Local Rule 5-1(h)(2), on Tuesday, December 23, 2014, I served a true and correct copy of the document(s) on the following parties via First Class mail through the U.S. Postal Service and by e-mail:

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*General Counsel for Defendant Zuffa, LLC*

Date: December 23, 2014

/s/ Kevin E. Rayhill

Kevin E. Rayhill